

## Regulatory Priorities for Ambient Air Monitoring QAPPs

Draft AQAO, 6/29/12

### Notes:

- Priorities have been determined based on several factors, but primarily focus on where ambient air monitoring data is the basis for regulatory actions, and also considers the likelihood of controversy and/or litigation. The primary focus here is on attainment determinations (designations, clean data findings, redesignations), but not the use of monitoring data in attainment demonstrations (in SIPs/FIPs).
- In cases where ambient air monitoring data is currently being collected without an approved QAPP in place, it may be possible that a future QAPP approval may not occur in time to influence the current action. In those cases, the focus here is more on understanding the status of the QAPP, identifying whether the current data collection meets our regulatory and data quality requirements, and anticipating where the lack of approved QAPP could impact a regulatory decision.

### Highest Priority QAPPs

- Imperial PM10 (anticipation of clean data finding request beginning with 2013 data)
- Great Basin PM10 (potential litigation, high likelihood of challenge on data quality)
- Pinal PM2.5 and PM10 (PM2.5 and PM10 SIP development, potential PM2.5 clean data finding)

**Comment [ML1]:** Michael, is this true?

**Comment [MF22]:** The three year clock for Imperial will start sometime soon, so the earliest /complete (3 calendar years) possible CDF would be with 2013-2015 data.

**Comment [ML3]:** Should this be highest or high priority?

**Comment [MF24]:** I think this should be "highest", as this is a highly controversial action (i.e. pressure from ag industry. Also, this should be easy to mark off the queue. We reviewed their plan in 2007 and found it OK, they just need to do minor updates and submit to EPA.

### High Priority QAPPs

- Bay Area PM2.5 (current clean data finding)
- Feather River PM2.5 (current clean data finding)
- Butte PM2.5 (current clean data finding)
- Sacramento PM2.5 (current clean data finding)
- ADEQ PM10 (Douglas/Paul Spur, finalize clean data finding)
- Maricopa PM10 (5% plan and eventual clean data finding)
- South Coast PM10 (potential clean data finding for Coachella Valley)
- Clark PM10 (maintenance plan and future redesignation request)

### Other QAPPs Needed for Regulatory Actions

- O3 QAPPs:
  - 8-hour ozone attainment and clean data findings: Sutter buttes, Chico, Western Nevada, Central and South Mountain Counties, East Kern, San Diego, Ventura, Imperial, and Phoenix
  - 1-hour ozone clean data findings: Sacramento and Southeast Desert
  - 2008 O3 NAAQS plan development in tribal areas: Pechanga and Morongo
- PM2.5 QAPPs:
  - PM2.5 designations (will likely rely on 2012-2014 data): all areas in Region 9

**Comment [ML5]:** I put all of the ozone actions in the lower priority category, on the guess that lack of approved QAPPs has never been cited as a reason to not move forward on ozone. But that's just a guess. Are there any of these that should be separated, based on our knowledge that there is potentially poor QA?

**Comment [ML6]:** Gwen: is this true?

- PM10 QAPPs:
  - PM10 designations (will likely rely on 2012-2014 data), focus on areas currently violating the PM10 standard, but not designated nonattainment: likely NDEP (Pahrump), SJV
- SO2 QAPPs:
  - SO2 Designations, focus on areas with currently violating monitors: Hawaii and ADEQ
- NO2 QAPPs:
  - New Near-Roadway NO2 sites, will be used once established (2013+) for future designations and as likely future PM2.5 sites: South Coast, SJV, San Diego, HDOH, Sacramento, Clark, Maricopa, BAAQMD

**Comment [ML7]:** Gwen: is this true?

**Comment [MF28]:** I defer to Gwen, but I believe we will not be designating any new PM10 area because we are retaining the standard.